

For Six Month Period Ending June 30, 1986
(Insert date)

Name of Registrant
Cleary, Gottlieb, Steen & Hamilton

Registration No. 508

Business Address of Registrant

1 - One State Street Plaza, New York, New York 10004
2 - 1752 N Street, N.W., Washington, D.C. 20036

I-REGISTRANT

1. Has there been a change in the information previously furnished in connection with the following:

(a) If an individual:

(1) Residence address	Yes <input type="checkbox"/>	No <input type="checkbox"/>
(2) Citizenship	Yes <input type="checkbox"/>	No <input type="checkbox"/>
(3) Occupation	Yes <input type="checkbox"/>	No <input type="checkbox"/>

(b) If an organization:

(1) Name	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
(2) Ownership or control	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
(3) Branch offices	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

2. Explain fully all changes, if any, indicated in item 1.

IF THE REGISTRANT IS AN INDIVIDUAL, OMIT RESPONSE TO ITEMS 3, 4, and 5.

3. Have any persons ceased acting as partners, officers, directors or similar officials of the registrant during this 6 month reporting period? Yes ☐ No ☒

If yes, furnish the following information:

Name

Position

Date Connection
Ended

4. Have any persons become partners, officers, directors or similar officials during this 6 month reporting period?
 Yes ☐ No ☒

If yes, furnish the following information:

<i>Name</i>	<i>Residence Address</i>	<i>Citizenship</i>	<i>Position</i>	<i>Date Assumed</i>
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5. Has any person named in Item 4 rendered services directly in furtherance of the interests of any foreign principal?
 Yes ☐ No ☐ Not applicable

If yes, identify each such person and describe his services.

6. Have any employees or individuals other than officials, who have filed a short form registration statement, terminated their employment or connection with the registrant during this 6 month reporting period? Yes ☒ No ☐

If yes, furnish the following information:

<i>Name</i>	<i>Position or connection</i>	<i>Date terminated</i>
John A. Menke	Associate	April 16, 1986
Elliott E. Polebaum	Associate	March 14, 1986

7. During this 6 month reporting period, have any persons been hired as employees or in any other capacity by the registrant who rendered services to the registrant directly in furtherance of the interests of any foreign principal in other than a clerical or secretarial, or in a related or similar capacity? Yes ☐ No ☒

If yes, furnish the following information:

<i>Name</i>	<i>Residence Address</i>	<i>Position or connection</i>	<i>Date connection began</i>
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II—FOREIGN PRINCIPAL

(PAGE 3)

8. Has your connection with any foreign principal ended during this 6 month reporting period? Yes ☒ No ☐

If yes, furnish the following information:

Name of foreign principal

Date of Termination

Peugeot S.A.

June 30, 1986

9. Have you acquired any new foreign principal¹ during this 6 month reporting period? Yes ☒ No ☐

If yes, furnish following information:

Name and address of foreign principal

Date acquired

Petroleos de Venezuela, S.A.

May 27, 1986

A.V. Libertador

La Campina

Apdo. 169

Caracas, 1010-A Venezuela

10. In addition to those named in Items 8 and 9, if any, list the foreign principals¹ whom you continued to represent during the 6 month reporting period.

CSR Limited, Sydney, Australia

III—ACTIVITIES

11. During this 6 month reporting period, have you engaged in any activities for or rendered any services to any foreign principal named in Items 8, 9, and 10 of this statement? Yes ☒ No ☐

If yes, identify each such foreign principal and describe in full detail your activities and services:

See Rider 11

¹The term "foreign principal" includes, in addition to those defined in section 1(b) of the Act, an individual or organization any of whose activities are directly or indirectly supervised, directed, controlled, financed, or subsidized in whole or in major part by a foreign government, foreign political party, foreign organization or foreign individual. (See Rule 100(a)(9)).

A registrant who represents more than one foreign principal is required to list in the statements he files under the Act only those foreign principals for whom he is not entitled to claim exemption under Section 3 of the Act. (See Rule 208.)

12. During this 6 month reporting period, have you on behalf of any foreign principal engaged in political activity² as defined below?
Yes ☒ No ☐

See response to Question 11, including Rider 11

If yes, identify each such foreign principal and describe in full detail all such political activity, indicating, among other things, the relations, interests and policies sought to be influenced and the means employed to achieve this purpose. If the registrant arranged, sponsored or delivered speeches, lectures or radio and TV broadcasts, give details as to dates, places of delivery, names of speakers and subject matter.

13. In addition to the above described activities, if any, have you engaged in activity on your own behalf which benefits any or all of your foreign principals? Yes ☐ No ☒

If yes, describe fully.

²The term "political activities" means the dissemination of political propaganda and any other activity which the person engaging therein believes will, or which he intends to, prevail upon, indoctrinate, convert, induce, persuade, or in any other way influence any agency or official of the Government of the United States or any section of the public within the United States with reference to formulating, adopting, or changing the domestic or foreign policies of the United States or with reference to the political or public interests, policies, or relations of a government of a foreign country or a foreign political party.

IV—FINANCIAL INFORMATION

14. (a) RECEIPTS—MONIES

During this 6 month reporting period, have you received from any foreign principal named in Items 8, 9 and 10 of this statement, or from any other source, for or in the interests of any such foreign principal, any contributions, income or money either as compensation or otherwise? Yes ☒ No ☐

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies.³

<i>Date</i>	<i>From Whom</i>	<i>Purpose</i>	<i>Amount</i>
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See Rider 14(a)

Total

(b) RECEIPTS—THINGS OF VALUE

During this 6 month reporting period, have you received any thing of value⁴ other than money from any foreign principal named in Items 8, 9 and 10 of this statement, or from any other source, for or in the interests of any such foreign principal? Yes ☐ No ☒

If yes, furnish the following information:

<i>Name of foreign principal</i>	<i>Date received</i>	<i>Description of thing of value</i>	<i>Purpose</i>
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³A registrant is required to file an Exhibit D if he collects or receives contributions, loans, money, or other things of value for a foreign principal, as part of a fund raising campaign. See Rule 201(e).
⁴Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks," and the like.

15. (a) **DISBURSEMENTS—MONIES**

During this 6 month reporting period, have you

(1) disbursed or expended monies in connection with activity on behalf of any foreign principal named in Items 8, 9 and 10 of this statement? Yes ☒ No ☐

(2) transmitted monies to any such foreign principal? Yes ☐ No ☒

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies, including monies transmitted, if any, to each foreign principal.

<i>Date</i>	<i>To Whom</i>	<i>Purpose</i>	<i>Amount</i>
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See Rider 15(a)

Total

15. (b) **DISBURSEMENTS—THINGS OF VALUE**

During this 6 month reporting period, have you disposed of anything of value⁵ other than money in furtherance of or in connection with activities on behalf of any foreign principal named in items 8, 9 and 10 of this statement?

Yes ☐ No ☒

If yes, furnish the following information:

<i>Date disposed</i>	<i>Name of person to whom given</i>	<i>On behalf of what foreign principal</i>	<i>Description of thing of value</i>	<i>Purpose</i>
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(c) **DISBURSEMENTS—POLITICAL CONTRIBUTIONS**

During this 6 month reporting period, have you from your own funds and on your own behalf either directly or through any other person, made any contributions of money or other things of value⁵ in connection with an election to any political office, or in connection with any primary election, convention, or caucus held to select candidates for political office?

Yes ☐ No ☒

If yes, furnish the following information:

<i>Date</i>	<i>Amount or thing of value</i>	<i>Name of political organization</i>	<i>Name of candidate</i>
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V—POLITICAL PROPAGANDA

(Section 1(j) of the Act defines "political propaganda" as including any oral, visual, graphic, written, pictorial, or other communication or expression by any person (1) which is reasonably adapted to, or which the person disseminating the same believes will, or which he intends to, prevail upon, indoctrinate, convert, induce, or in any other way influence a recipient or any section of the public within the United States with reference to the political or public interests, policies, or relations of a government of a foreign country or a foreign political party or with reference to the foreign policies of the United States or promote in the United States racial, religious, or social dissensions, or (2) which advocates, advises, instigates, or promotes any racial, social, political, or religious disorder, civil riot, or other conflict involving the use of force or violence in any other American republic or the overthrow of any government or political subdivision of any other American republic by any means involving the use of force or violence.)

16. During this 6 month reporting period, did you prepare, disseminate or cause to be disseminated any political propaganda as defined above? Yes ☐ No ☒

IF YES, RESPOND TO THE REMAINING ITEMS IN THIS SECTION V.

17. Identify each such foreign principal.

⁵Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks," and the like.

18. During this 6 month reporting period, has any foreign principal established a budget or allocated a specified sum of money to finance your activities in preparing or disseminating political propaganda? Yes ☐ No ☐

If yes, identify each such foreign principal, specify amount, and indicate for what period of time.

19. During this 6 month reporting period, did your activities in preparing, disseminating or causing the dissemination of political propaganda include the use of any of the following:

☐ Radio or TV broadcasts ☐ Magazine or newspaper articles ☐ Motion picture films ☐ Letters or telegrams
☐ Advertising campaigns ☐ Press releases ☐ Pamphlets or other publications ☐ Lectures or speeches

☐ Other (specify) _____

20. During this 6 month reporting period, did you disseminate or cause to be disseminated political propaganda among any of the following groups:

☐ Public Officials ☐ Newspapers ☐ Libraries
☐ Legislators ☐ Editors ☐ Educational institutions
☐ Government agencies ☐ Civic groups or associations ☐ Nationality groups
☐ Other (specify) _____

21. What language was used in this political propaganda:

☐ English ☐ Other (specify) _____

22. Did you file with the Registration Section, U.S. Department of Justice, two copies of each item of political propaganda material disseminated or caused to be disseminated during this 6 month reporting period? Yes ☐ No ☐

23. Did you label each item of such political propaganda material with the statement required by Section 4(b) of the Act? Yes ☐ No ☐

24. Did you file with the Registration Section, U.S. Department of Justice, a Dissemination Report for each item of such political propaganda material as required by Rule 401 under the Act? Yes ☐ No ☐

VI—EXHIBITS AND ATTACHMENTS

25. EXHIBITS A AND B

- (a) Have you filed for each of the newly acquired foreign principals in Item 9 the following:

Exhibit A⁶ Yes ☒ No ☐
Exhibit B⁷ Yes ☒ No ☐

If no, please attach the required exhibit.

- (b) Have there been any changes in the Exhibits A and B previously filed for any foreign principal whom you represented during this six month period? Yes ☐ No ☒

If yes, have you filed an amendment to these exhibits? Yes ☐ No ☐

If no, please attach the required amendment.

⁶The Exhibit A, which is filed on Form CRM-157 (Formerly OBD-67) sets forth the information required to be disclosed concerning each foreign principal.

⁷The Exhibit B, which is filed on Form CRM-155 (Formerly OBD-65) sets forth the information concerning the agreement or understanding between the registrant and the foreign principal.

26. EXHIBIT C

If you have previously filed an Exhibit C⁸, state whether any changes therein have occurred during this 6 month reporting period. Yes ☐ No ☐

Not applicable

If yes, have you filed an amendment to the Exhibit C? Yes ☐ No ☐

If no, please attach the required amendment.

27. SHORT FORM REGISTRATION STATEMENT

Have short form registration statements been filed by all of the persons named in Items 5 and 7 of the supplemental statement?

Yes ☐ No ☐

Not applicable

If no, list names of persons who have not filed the required statement.

The undersigned swear(s) or affirm(s) that he has (they have) read the information set forth in this registration statement and the attached exhibits and that he is (they are) familiar with the contents thereof and that such contents are in their entirety true and accurate to the best of his (their) knowledge and belief, except that the undersigned make(s) no representation as to the truth or accuracy of the information contained in attached Short Form Registration Statement, if any, insofar as such information is not within his (their) personal knowledge.

(Type or print name under each signature)

(Both copies of this statement shall be signed and sworn to before a notary public or other person authorized to administer oaths by the agent, if the registrant is an individual, or by a majority of those partners, officers, directors or persons performing similar functions who are in the United States, if the registrant is an organization.)

J. Eugene Marans
J. Eugene Marans

Fred D. Turnage
Fred D. Turnage

Daniel B. Silver
Daniel B. Silver

John S. Magney
John S. Magney

Subscribed and sworn to before me at

Washington, D.C.

this *30th* day of *July*, 19 *86*

Raymond K. Caskin
(Signature of notary or other officer)

My Commission Expires January 31, 1989

⁸The Exhibit C, for which no printed form is provided, consists of a true copy of the charter, articles of incorporation, association, constitution, and bylaws of a registrant that is an organization. (A waiver of the requirement to file an Exhibit C may be obtained for good cause upon written application to the Assistant Attorney General, Criminal Division, Internal Security Section, U.S. Department of Justice, Washington, D.C. 20530.)

RIDER 11: ACTIVITIES

CSR Limited

Registrant acts as counsel to CSR Limited, marketing agent for the Queensland Sugar Board. In this capacity, during the period registrant advised the Company with respect to regulations concerning the U.S. sugar market and with respect to administrative and legislative proposals relating to the U.S. sugar market. In this connection, registrant was from time to time during the period in telephonic communication with officials of the U.S. Department of Agriculture, the Office of the U.S. Trade Representative, the U.S. International Trade Commission and the U.S. Customs Service in order to obtain information regarding the foregoing subjects.

Registrant was from time to time during the period in telephonic communication with officials of the Australian Embassy to the United States with respect to matters concerning the authorized quarterly shipping pattern of raw sugar from Australia under the U.S. Program.

Registrant participated in meetings with the Chief of the Sugar Group in the Foreign Agricultural Service of the U.S. Department of Agriculture on March 5, 1986 and May 14, 1986 with respect to matters concerning the authorized quarterly shipping pattern of raw sugar from Australia under the U.S. Program and related issues concerning the sale of Australian sugar in the United States.

Peugeot S.A.

Registrant provides legal services to Peugeot S.A., only some of which may be regarded as requiring registration under the Foreign Agents Registration Act of 1938.

During the period, registrant advised Peugeot S.A. concerning the prospects for the grant of certiorari by the Supreme Court of the United States in two cases pending before the Court, Anscheutz & Co., GmbH v. Mississippi River Bridge Authority, No. 85-98 and Messerschmitt Bolkow Blohm GmbH v. Walker, No. 85-99. In this regard, registrant was from time to time in telephonic communication with officials of the Office of the Legal Adviser, U.S. Department of State, the Office of Foreign Litigation, U.S. Department of Justice and the Office of the Solicitor General, U.S. Department of Justice. In addition, registrant attended a meeting on January 26, 1986 with officials of the Office of the Solicitor General, U.S. Department of Justice. The purpose of such telephone calls and meeting was to advise such officials of the views of Peugeot S.A. on the question whether certiorari should be granted in the above-mentioned cases.

Petroleos de Venezuela S.A.

Registrant provides legal services to Petroleos de Venezuela S.A. ("PDVSA"), only some of which may be regarded as requiring registration under the Foreign Agents Registration Act of 1938.

During the period, registrant advised PDVSA on the effects of the proposed tax reform bill on PDVSA's plans to make two major acquisitions in the United States. In this regard, registrant attended a meeting on May 16, 1986 with officials of the Office of International Tax Counsel, U.S. Department of Treasury. The purpose of such meeting was to advise such officials of the views of PDVSA on provisions in the tax reform bill that would affect the taxation of foreign governments and their wholly owned corporations.

RIDER 14(a): RECEIPTS - MONIES

CSR Limited

1/22/86	Fees	\$ 12,500.00
	Disbursements	1,020.25
3/5/86	Fees	6,200.00
	Disbursements	469.53
5/15/86	Fees	6,150.00
	Disbursements	<u>355.71</u>
	TOTAL:	\$ 26,695.49

Petroleos de Venezuela, S.A.

Fees	\$ 00.00
Disbursements	<u>00.00</u>
TOTAL:	\$ 00.00

Peugeot S.A.

4/1/86	Fees	\$102,500.00
	Disbursements	17,334.14
4/21/86	Fees	42,500.00
	Disbursements	3,780.28
4/24/86	Fees	6,250.00
	Disbursements	100.07
4/25/86	Fees	15,750.00
	Disbursements	1,967.22
5/1/86	Fees	500.00
	Disbursements	16.14
5/9/86	Fees	1,000.00
	Disbursements	<u>294.86</u>
	TOTAL:	\$191,992.71

RIDER 15(a): DISBURSEMENTS - MONIES

CSR Limited

C & P Telephone Washington, D.C.	Tolls	\$ 87.92
ITT World Communications Hicksville, N.Y.	Telexes	126.73
Other Communication	Tolls, Allocation of indirect expenses	181.23
The International Club Washington, D.C.	Conference	120.69
Mr. Duncan's Residence Washington, D.C.	Dinner meeting	75.00
The Sugar Club New York, N.Y.	Membership dues	50.00
GPO Bookstore Washington, D.C.	Publication	10.00
Miscellaneous In-House Expenses Washington, D.C.	Overtime Stenography	40.25
	Duplicating	15.20
	Messenger Service	87.50
	Postage	25.10
	Local Transportation	33.65
	TOTAL:	\$853.27

RIDER 15(a): DISBURSEMENTS - MONIES (continued)

Petroleos de Venezuela, S.A.

New York Telephone Co. New York, N.Y.	Tolls	\$ 21.02
Other Communication	Tolls, Allocation of indirect expenses	10.51
American Express Newark, N.J.	Travel	428.96
Miscellaneous In-House Expenses	Duplicating	9.30
New York, N.Y.	Messenger Service	9.00
Washington, D.C.	Local Transportation	90.00
	TOTAL:	\$568.79

RIDER 15(a): DISBURSEMENTS - MONIES (continued)

PEUGEOT S.A.

New York Telephone Co. New York, N.Y.	Tolls	\$2,741.70
C&P Telephone Co. Washington, D.C.	Tolls	134.04
Other Communication	Tolls, Allocation of indirect expenses	1,474.86
Record Press Inc. New York, N.Y.	Duplicating	100.13
Sup. Reprod. Systems New York, N.Y.	Duplicating	86.60
Superior Court of D.C. Washington, D.C.	Duplicating	91.50
Fried, Frank, Harris, Shriver & Kampelman Washington, D.C.	Duplicating	332.99
Federal Express Memphis, TN.	Shipping	296.25
Sky Courier Washington, D.C.	Shipping	50.00
Moonbeam Courier New York, N.Y.	Shipping	19.00
RCA Global Communications New York, N.Y.	Telexes	145.30
Western Union Atlanta, Georgia	Telexes	23.81
Ace Car & Limo New York, N.Y.	Local fares	911.00
Fone A Cab New York, N.Y.	Local fares	157.50
Prompt Radio Inc. New York, N.Y.	Local fares	340.80
Escort Corp. New York, N.Y.	Local fares	304.28

RIDER 15(a): DISBURSEMENTS - MONIES (continued)

PEUGEOT S.A. (continued)

Summit Limousine New York, N.Y.	Local fares	114.00
Red Top Cab Co. Arlington, VA.	Local fares	28.26
India House Inc. New York, N.Y.	Meals	80.14
Marriott Corp. Bethesda, MD.	Meals	43.30
American Express Newark, N.J.	Meals	102.15
American Express Newark, N.J.	Travel	793.64
Travel Corp. of America New York, N.Y.	Travel	5,779.47
The Ritz-Carlton Hotel San Francisco, CA.	Travel	190.00
Wagons-lits Tourisme Paris, France	Travel	1,086.68
La Residence du Bois Paris, France	Travel	654.93
The Roebuck Company London, England	Travel	75.98
American National Bank New York, N.Y.	Foreign currency	222.92
Record Press Inc. New York, N.Y.	Binding	992.11
Dinatalie Detective Agency New York, N.Y.	Prof. Services	393.49
CT Corporation System New York, N.Y.	Documents	5.49
Crain Communication Co. New York, N.Y.	Publication	3.00
Mead Data Central Atlanta, GA.	Lexis	861.26
West Publishing Co. St. Paul, MN.	Westlaw	237.94

RIDER 15(a): DISBURSEMENTS - MONIES (continued)

PEUGEOT S.A. (continued)

Miscellaneous In-House Expenses	Overtime Stenography	5,079.14
New York, N.Y.	Duplicating	2,086.12
Washington, D.C.	Word Processing	6,674.51
Paris, France	Messenger Service	373.35
	Postage	78.96
	Local Transportation	1,360.05
	Supplies	96.82
	Allocation of indirect Lexis expense	430.64
	Allocation of indirect Westlaw expense	118.97
	TOTAL:	\$35,173.08

UNITED STATES DEPARTMENT OF JUSTICE
REGISTRATION UNIT
CRIMINAL DIVISION
WASHINGTON, D.C. 20530

NOTICE

Please answer the following questions and return this sheet in triplicate with your supplemental statement:

1. Is your answer to Item 16 of Section V (Political Propaganda - page 7 of Form OBD-64 - Supplemental Statement):

Yes _____ or No X

(If your answer to question 1 is "yes" do not answer question 2 of this form.)

2. Do you disseminate any material in connection with your registration:

Yes _____ or No X

(If your answer to question 2 is "yes" please forward for our review copies of all such material including: films, film catalogs, posters, brochures, press releases, etc. which you have disseminated during the past six months.)

J. Eugene Marans
Signature

July 30, 1986
Date

J. Eugene Marans
Please type or print name of signatory on the line above

Partner
Title

RECEIVED
CRIMINAL DIVISION
JUL 30 9 36 AM '86
FEDERAL BUREAU OF INVESTIGATION
REGISTRATION UNIT